KEN THERRIEN 1 413 NORTH SECOND STREET 2 **YAKIMA, WA 98901** 3 509.457.5991 4 Attorney for: 5 ARTURO TEJEDA-GOMEZ 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF WASHINGTON 10 (Honorable Salvador Mendoza, Jr.) 11 12 NO. 21-CR-6004-SMJ-1 UNITED STATE OF AMERICA, 13 Plaintiff. 14 MOTION TO EXPEDITE VS. 15 May 18, 2021 at 6:30 PM 16 Richland, WA - Without Oral ARTURO TEJEDA-GOMEZ, 17 Argument Defendant. 18 19 COMES NOW the defendant, ARTURO TEJEDA-GOMEZ, by and 20 21 through his attorney of record, Ken Therrien, and moves the Court to consider on 22 an expedited basis Motion to Continue Pre-trial Conference and Trial Date. 23 24 This motion is based on the records and files in the instant action and the 25 Declaration of counsel. 26 27 // 28 29 MOTION TO EXPEDITE 30 KEN THERRIEN, PLLC Page 1 413 NORTH SECOND STREET 31 YAKIMA, WA 98901 (509) 457-5991

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Declaration of Counsel

I am the attorney for Arturo Tejeda-Gomez. Counsel for Mr. Tejeda-Gomez is requesting to continue trial due to reasons mentioned in motion to continue pre-trial and trial date. Counsel for Mr. Tejeda-Gomez has contacted AUSA Ben Seal and counsel for co-defendant, Robin Emmans, regarding the request to continue trial and pretrial motions. AUSA Seal and Ms. Emmans, have no objection. I am requesting this motion to be expedited to allow the Court time to address this matter.

Dated this 18th day of August, 2021.

/s/ Ken Therrien

KEN THERRIEN, WSBA #20291 Attorney for Arturo Tejeda-Gomez 413 North Second Street Yakima, WA 98901 (509) 457-5991

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KEN THERRIEN, PLLC 413 NORTH SECOND STREET YAKIMA, WA 98901 (509) 457-5991 **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury of the laws of the State of Washington that on August 18, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

- Benjamin Seal, Assistant United States Attorney
- Robin Emmans, Attorney for Andres Gutierrez

s/Ken Therrien

KEN THERRIEN, WSBA #20291 Attorney for Arturo Tejeda-Gomez 413 North Second Street Yakima, WA 98901 (509) 457-5991

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